

STATEMENT OF COMMUNITY DISTRICT EDUCATIONAL COUNCILS AND CITYWIDE COUNCILS TO MAYOR-ELECT BILL DE BLASIO

EXECUTIVE SUMMARY

Reform of the Panel for Educational Policy (PEP)

- Direct the new Chancellor to engage actively with the Community and Citywide Education Councils in setting the agenda of the Panel for Educational Policy and in shaping the recommendations that come before the Panel.
- Undertake structural reform of the Panel for Educational Policy, as well as other changes that will assure that the Panel functions as more than a rubber stamp.

Networks and Organizational Structure

- Return to the basic organizational structure of Community School Districts for Pre-K—8, bolstering the local superintendents and Community School District (CSD) structure while creating a support system that meets the needs of high schools.
- Eliminate the current network structure and rethink the role of the networks in a way that is consistent with allowing for a return to the CSD organizational structure.
- For high schools, retain networks if there is enough support among principals, but only with increased transparency, supervision by superintendents and accountability to the community.

Space Utilization and Planning

- Develop a more ambitious Capital Plan that would provide for the space necessary to eliminate school overcrowding, allow for smaller classes, work toward making all facilities accessible to those with disabilities, devote adequate funding to Maintenance/Repairs and ensure adequate, appropriate and dedicated facilities for education of all students, including ELL and students with special needs, libraries, science, lunch and gym, as well as “cluster” programs such as arts, music and technology.
- Reform the Bluebook formulas so that they more accurately reflect overcrowding, incorporate the need for smaller classes as outlined in the CFE settlement, encompass both mandated and school-based programs and ensure that our schools’ “instructional footprints” provide adequate, appropriate and dedicated facilities as described immediately above. Assure that the Bluebook formulas and their usage are subject to periodic reviews with a Working Group that includes parents and is convened every four years.
- Reform the Office of Portfolio Planning and create an Office of Community Planning with CEC and Citywide Council representation. Provide a meaningful opportunity for Community Education Councils to collaborate and partner with this Office in order to influence planning for new educational programming.

Chancellor Selection

- Ensure that parents and community members are intimately involved and play a key role in the vetting and selection of the next Chancellor.

Charter Schools and Co-Locations

- Implement an immediate Moratorium on charter school co-locations and school closings.
- Roll back any co-locations which have been approved for future implementation by the PEP/current Administration and which are not currently educating students.
- Ensure that all future co-locations are done with the support of the affected communities.

- Enforce the provision in New York State law which requires co-located charter schools to pay for the services and space that they are currently receiving from the DOE without payment, and use the proceeds of these rent payments to benefit the affected communities.

Common Core

- Initiate an immediate re-evaluation of the Common Core implementation.
- Support outreach to and dialogue with parents and communities about the origins, objectives and value of the Common Core, including the role of testing and test preparation in its implementation.

Standardized Testing

- Initiate a Moratorium on the use of standardized tests for any high-stakes decisions related to students, teachers or schools and support the use of widely-available alternatives to standardized tests, such as portfolio assessments and teacher-created assessments.
- Discontinue any existing or in-the-pipeline K-2 high-stakes testing initiatives.
- Reconstitute the School Progress Reports to minimize significantly the role of standardized tests in the evaluation of our schools, assure that the distinction between “performance” and “progress” is communicated more clearly, and include information that is relevant to parents (such as resource availability, class sizes, and provision of arts and physical education).
- Initiate a Moratorium on evaluating teachers on the basis of standardized tests.

Special Education

- Initiate an immediate independent review of current functioning of the assessment and service delivery system for Special Education in the schools.
- Ensure that all communications related to Special Education, including IEPs, are provided to parents in their native language and that all parents have access to SESIS in their native language.
- Invest in proven, successful, research-based programs for students with special needs, including the innovative use of assistive technology.

Student Information and Data

- Protect student information and privacy by opting out of data-sharing with *inBloom* or any similar program or venture.

Dear Mayor-Elect de Blasio:

We write to you today as members of this city's thirty-two Community Education Councils (CECs) and four Citywide Councils - the elected parent-representatives of New York City's public school parents created under NY State Law 2590 (e). Some of us have served only a few months, while others have served since the inception of these parent Councils almost 11 years ago with the imposition of Mayoral Control. All of us are eager to work with you and your administration for the improvement of our public education system and to have our voices – and those of our children, community members and our fellow parents – heard and considered.

Below are areas of concern related to: reform of the PEP, Networks and organizational structure, space utilization and planning, Common Core, high-stakes testing, special education, chancellor selection, and other important issues. Some of these you will control directly over during your tenure, while others will require legislative changes at the City Council and State level. All of these issues are critical to the education of our children and we urge you to support them and work with us toward their implementation.

Reform of the Panel for Educational Policy (PEP)

The implementation of Mayoral Control in 2002, and the replacement of the Board of Education with the Panel for Educational Policy (PEP), were meant to streamline decision-making and increase accountability and transparency in our public schools. While decisions and policy implementation certainly have become streamlined, all major organizational decisions on space utilization, school closings, charter school co-locations, major contracts, budget priorities, testing, curriculum and the selection of a chancellor have been made by the mayor alone without consultation or meaningful input from parents or community members.

Though confident that in a new administration the voices of parents and other stakeholders will carry more weight than during the previous 12 years, we strongly urge you to support structural reform of the PEP, including fixed terms, staggered terms, term limits, parent representation on the PEP and coordinating PEP and CEC/Citywide Councils collaboration, when it comes up in the state legislature in 2015.

In the interim, we urge you to direct the next Chancellor to actively engage with the Community Education Councils in the formation of the PEP's agenda and in shaping the recommendations coming before that body in a meaningful way.

Networks and Organizational Structure

A signature policy of the Bloomberg administration has been the elimination of geographically-based school support structures (districts and regions) in favor of networks and clusters whose organizational principles and personnel seem constantly in flux and whose responsibilities vis-à-vis the schools they support are not clearly articulated to the public. The networks' accountability appears non-existent: although principals are in theory free to choose a different network if the support provided is inadequate, networks are not answerable to the communities they serve, and the lack of transparency prevents meaningful evaluation of their effectiveness. Restructuring school support away from geography also uses resources inefficiently - as personnel spend much of their time shuttling to and from schools - while undermining

cohesiveness and community at the local level, as principals and staff at one school have little information about nearby schools, including feeder schools.

We recommend the elimination of networks and a return to the basic organizational structure of the community school district, as well as bolstering the local superintendents, for elementary and middle schools. For high schools, however, we recognize that a different support structure may be appropriate and that high school principals may prefer to be supported by networks, which can be more sensitive to a school's particular interests and challenges. Nonetheless, to the extent that the network structure is retained for high schools, it must operate in a transparent way, under tight supervision by the high school superintendents and with clear accountability to the community.

Space Utilization and Planning

As described by state law, CECs are required partners in space planning, utilization and development. CECs perform considerable research executing this statutorily defined function, including holding public hearings on the annual capacity plans, submitting priorities and commenting on plans, based on data from the chancellor, feedback from district schools, and our independent research and outreach. CECs are also responsible for an enhanced district report card and for liaising with school communities, both of which provide fine-grained, on-the-ground perspectives on any individual school's space concerns and the space needs of the district as a whole. Despite this, the Office of Portfolio Planning (OPP) currently does nearly all space planning, with no input from CECs. OPP has been singularly unreceptive to serious engagement with CECs and the communities we serve. Joint Public Hearings on space utilization, required by law, which include the closing of community schools and the co-location of charter schools or new public schools, are often as contentious as they are futile.

Part and parcel of this problem is OPP's reliance on the Blue Book, a School Construction Authority-produced guide to school space usage that in many cases fails to: take into account actual use of rooms; properly account for limitations placed by the shared spaces (e.g., location and number of bathrooms, size of cafeteria, width of stairwells, etc.); or allow for laboratories, libraries, and specialized therapy rooms for students with special needs. The Blue Book capacity formula simply does not reflect the actuality of what happens in the schools and what students' needs are. Additionally, the formula underestimates basic per pupil space needs and is based on an instructional footprint that allows for 25 first graders to be packed into a 500 square foot room. Despite what the footprint allows in terms of cluster rooms, when a school is co-located, cluster rooms are converted to classrooms, which are then included in the capacity calculation, changing the capacity of the school and ensuring that the cluster room is permanently lost. Additionally, the number of cluster rooms allocated per school is too few, resulting in students receiving mandated services in spaces that are inappropriate. Finally, many schools in NYC also use "transportable" classrooms, or trailers, to educate students, a practice which is a clear indicator of poor space and enrollment planning.

We recommend that the Office of Portfolio Planning be reorganized, instituting broad-based changes including the inclusion of parents into the review and planning phases. Such an office will integrate input of the affected communities and engage in meaningful decision-making reflective of the many needs within our school communities while reporting back to a Central Planning Committee.

We further recommend that the Blue Book formula be completely revamped and reviewed with a working group that includes CEC members and parents, and that in the future, this review panel reconvene every four years. We recommend that the space usage designations in the Blue Book take into account not just the bare minimum of space a school needs, but the programs that each school actually does – or should be able to – offer, including all state-mandated programs such as physical education, art, dance and music, as well as computer and technology programs.

We further recommend that the footprint and capacity formula reflect the target class sizes as outlined in the settlement of the Campaign for Fiscal Equity lawsuit.

Chancellor Selection

We urge you to engage the CECs and parents in your process to select a new Chancellor. We suggest that you identify the candidates for this critical position in an open fashion, and enable communities of parents to engage with them. We also urge you to give parents a voice in this process by including several Citywide forums to provide information to NYC public school parents as well as an introduction of potential candidates.

We ask that you select a person with a background in education, who has had experience in leading a large school system, is open to innovation and is respectful of the input of families.

Charter Schools and Co-Locations

Co-locations continue to be a source of contention in the districts. Many community members feel that any hearings are exercises in futility, as there have been few denials of charter school plans to enter a school. We are often faced with outright land grabs when charter schools enter buildings and usurp specialized rooms such as labs, music rooms or therapy rooms. We have yet to see the promised sharing of resources and successful practices, as set forth in the original plans describing charter schools as laboratories for the development of innovative teaching methodologies.

We strongly support the view that any co-locations must be done with the support of the affected communities. We also believe that the state law on charters paying rent must be followed, and would like to address the issue of using such rent payments to benefit the communities affected by co-locations.

Common Core

The development and adoption of the Common Core State Standards (CCSS) were implemented with very little input from parents in New York City. Now our entire education system in the city is driven by the CCSS, yet parents have not been given adequate information on what the CCSS is, let alone how to help our children. The City's implementation of the CCSS has also been chaotic, with schools lacking training and curriculum materials well into the school year, major communications breakdowns, and rushed roll-out of new, one-size-fits-all assessments which seem arbitrarily to categorize the vast majority of our children as failures. If there is any validity to the CCSS (which not all educators embrace) it will be overshadowed by the poor implementation.

We urge the City to take a leading role in re-evaluating the implementation of the CCSS. The new standards are demanding and cumulative from grade to grade (meaning to achieve 6th grade standards requires mastery of 5th grade standards). It would make more educational sense to phase in the CCSS one grade at a time. The way the CCSS is currently implemented requires students to master skills at an accelerated pace, not allowing for the type of deep understanding promoted by the very standards. This sudden implementation is likely to increase the achievement gap, as students already lagging behind will have further ground to cover to get to grade level on the new standards. If we are to move forward with the CCSS, understanding how children learn and how teachers teach effectively should be the foundation of the implementation strategy.

We also urge that the new administration begin outreach and dialogue with parents and communities about the origins, objectives and value of the CCSS, including the role of testing and test preparation in the CCSS implementation. We would like the new administration to bring the NYS Education Department into this conversation as well. Parents must have a chance to learn more about the CCSS, and have our legitimate concerns in this area listened to, understood and acted upon.

High Stakes Testing: Impact on Students, Schools and Teachers

Parents, teachers and administrators are all increasingly troubled by the growing emphasis on high-stakes testing and its impact on our schools' teaching environment. Under the rubric of "accountability," high-stakes tests have achieved a dominance that is dramatically changing classroom culture. Instead of a classroom environment which encourages curiosity and critical thinking – rooted in teachers' freedom to make professional, independent decisions about instruction and curriculum - we're seeing our schools pressured to "teach to the test" and supplant regular instruction with test prep, since school test performance reluctantly takes administrative priority. The number of classroom hours spent in test-taking (six days this past spring) and preparing for them takes away valuable and irreplaceable teaching time, and the quality of teaching in our children's classrooms is sadly compromised.

While we acknowledge that testing in and of itself has its uses for assessment or to periodically gauge aspects of student achievement, most educators and many education policy makers concur that the state tests do not fit the extremely high stakes purposes for which they are being used. Many of the test questions currently in use have been flagged as pedagogically unsound, and the tests overall produce overly narrow, inconsistent and unreliable measures of student progress and accomplishment. High-stakes tests are also completely developmentally inappropriate for K-2 students (the newest, youngest age group targeted for them) – as a whole chorus of child development specialists and educators can attest. Yet the tests are being used as both gatekeepers to determine students' qualifications to advance a grade and to judge the overall quality of schools.

We recommend that you place a moratorium on the use of these tests in these "high stakes" capacities, and take a firm stand against the use of tests in kindergarten through second grades, which seems a harmful trend.

Most recently, and perhaps most insidiously, the state test results are being used as a measure of teacher performance. The decision to link student performance on state tests to a value-added algorithm assessing teacher quality makes students and parents unwitting or unwilling collaborators in an evaluation system that lacks validity, contributes to lowered morale, and may result in wrongfully negative teacher assessments and concomitant job insecurity. A recent, rigorously researched study shows that, amidst our national worries about how U.S. students compare internationally in academics, middle-class U.S. students perform on a par with the highest achieving nations.¹ When the data is disaggregated, the differentiations we see are mostly related to socio-economic status. In short, poverty is the root problem in struggling schools, not bad teachers.

We recommend that you work to modify this aspect of the teacher evaluation, recognizing that this may involve re-negotiating Race to the Top monies.

Special Education

Recent changes in the delivery system of special education for students with IEPs have been a cause for concern. Implementation of the changes has resulted in confusion at the school level. Principals have repeatedly raised issues regarding appropriate funding; staff have raised concerns about their own preparedness for the changes; and parents have been left with a sense of dread as they register their children in schools or watch their children progress through the system. While we appreciate the effort to roll out these changes gradually, it has been noted by parents that schools often do not understand the changes. Parents attest to the fact that IEP teams will often suggest changes to a child's IEP to meet service availability at the school, rather than services mandated in an already approved IEP. Middle and high school application processes limit students with IEPs to fewer schools, especially those students who use wheelchairs, have ambulation problems or who desire access to CTE programs.

Beyond these recent changes, the assessment and delivery of special education services for students has long fallen short of the mark. Parents are also unable to monitor whether and how students are receiving IEP-mandated services, in part because parents have no access to the SESIS system. In addition, IEPs and information concerning a child's receipt of services (including access to SESIS) are often not provided to parents in their home language.

We recommend an immediate review of the current system. NYC DOE should also invest in proven, successful, research-based programs for students with special needs, including the innovative use of assistive technology.

Student Information and Data

Recently a legal action by 12 parents, which we support, regarding student data and privacy, has been filed. Additionally, elected officials from New York State have proffered legislation to opt out of *inBloom*, the NYSED program for student data-sharing. While this opt-out runs the risk of losing Race to the Top money for schools, we strongly support efforts to limit access to our children's school records.

¹ Carnoy, M; Rothstein, R. "*What Do International Tests Really Show About U.S. Student Performance?*" Economic Policy Institute Report, Jan. 28, 2013.

Other Important Issues

In the interest of brevity, we mention a few additional items which are of serious importance to our CECs which we would greatly appreciate the opportunity to address with the new administration, including: class sizes; the continually increasing achievement gaps between students on socio-economic and racial lines; maintaining diversity in our schools; changes to the admissions process for high school, middle school, and G&T programs; and immediate remediation for Sandy-affected schools.

The best students and schools are those in which parents are actively involved. “Schools would have to spend \$1,000 more per pupil to reap the same gains that an involved parent brings.”² The same holds true for the school systems.

As you prepare to take the helm of our great school system, we urge you to support and adopt these policy recommendations as the considered views of the public school parents and students we were elected to serve. We look forward to working closely with you for the betterment of all of our students and schools.

Yours sincerely,

Signatories as of December 16, 2013:

Community District Education Council 1
Community District Education Council 2
Community District Education Council 3
Community District Education Council 5
Community District Education Council 6
Community District Education Council 12
Community District Education Council 13
Community District Education Council 14
Community District Education Council 15
Community District Education Council 17
Community District Education Council 20
Community District Education Council 21
Community District Education Council 22
Community District Education Council 25
Community District Education Council 26
Community District Education Council 28
Community District Education Council 29
Community District Education Council 30
Community District Education Council 31
Citywide Council on English Language Learners
Citywide Council on Special Education
Citywide District 75 Council

² Houtenville, AJ; Conway, KS. Parental effort, school resources and student achievement. *Journal of Human Resources*, 2008; 43(2), 437-453.

Individual Member Signatories

Stanley Ng, CCHS Manhattan Representative for Districts 1, 2, and 3

Marianne Russo, CCHS Brooklyn Representative for Districts 15, 17, 18, 20, 21, 22

Melanie Mendonca, Community District Education Council 23

Additional signatories will be added throughout the month of December